

## **Exhibit E**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ROBERT BANDFIELD, et al.,

Defendants.

**14-CR-476 (ILG)**

**STATEMENT OF  
ROBERT BANDFIELD**

ROBERT BANDFIELD, defendant in the above-captioned matter, states as follows:

1. I am a United States citizen over 18 years of age. I am a defendant in the above-captioned matter. I am providing information in connection with my Pre-Trial Motions in this matter, specifically the motion to suppress the items taken in the search of IPC Corporate Service's offices in Belize and the items seized from me and my wife on the day of my arrest. This statement is based upon my own personal knowledge.
2. I am originally from the State of Oregon, where I lived for most of my life. I moved to the country of Belize with my common law wife, Glenna Fay Bergey, in approximately 2003.
3. I operated a company known generally as IPC, which provided international corporate and trust services in Belize. I ran IPC for 24 years and employed anywhere from 5 to 10 other people, depending on the time.
4. For reasons relating to security concerns in Belize, I kept many of my personal items in the IPC office located at The Matalon Building in Belize City, Belize. Among the personal items I kept at the IPC office were the following:
  - a. My personal Last Will and Testament;
  - b. My personal health and medical records and health insurance records;
  - c. My file concerning my personal wishes upon death;
  - d. My personal tax records dating back to about 2003;
  - e. Copies of receipts and other information necessary to prepare my personal taxes;
  - f. My personal file regarding my two life insurance policies;
  - g. My personal bank account information and records;

- h. My personal records concerning a prior divorce;
- i. My personal file of correspondence with my son and daughter; and
- j. Family photos and memorabilia (taken from files and directly off the walls and desk).

5. All of the above personal items were taken during the search and seizure of IPC's office on September 9, 2014 in connection with this case.

6. My understanding from friends and contacts in Belize is that the items seized on September 9, 2014 were delivered to Attorney Marilyn Williams Law Office on IPC's behalf on or around December 14, 2014. However, the items were returned in a haphazard manner. Two computers and several keyboards were broken; boxes and documents were left in disorganized piles; all of the previously-kept organization of the items was lost and all the materials were in disarray. I understand that some of IPC's items were mistakenly returned to other offices. I also understand that many files appear to be missing and still have not been returned by the FIU, including two IPC servers and two 4-terabyte back-ups, which contain both IPC and personal information.

7. In addition, when I was arrested on September 9, 2014 as my wife and I were travelling from the United States back to Belize, the agents who arrested me seized my personal laptop computer and a flash drive, as well as my wife's personal laptop.

8. Many of the items on my laptop that was taken that day are personal in nature. Among other items, my laptop held the following:

- a. My personal electronic tax records;
- b. An electronic copy of my personal Last Will and Testament;
- c. An electronic copy of my file regarding my wishes upon death;
- d. An electronic file of all of my personal passwords to various accounts and databases;
- e. Electronic copies of my personal bank records in Belize and the United States;
- f. Photographic records of my collection of paintings (personally painted); and,
- g. Personal photographs of family, friends, and experiences.

9. To date, my laptop and flashdrive have not been returned to me (or to my attorneys since I am incarcerated), nearly fifteen months after the time they were taken on September 9, 2014. My wife's laptop has not been returned to her either.

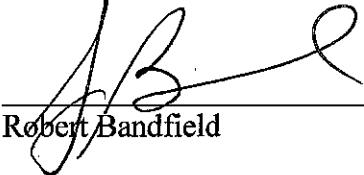
10. Further, the United States Government first produced imaged copies of my laptop and flashdrive on November 3, 2015, more than a year after they were seized, and almost six

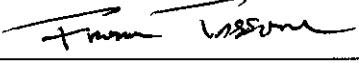
months after Judge Glasser's discovery deadline in my case of May 18, 2015. According to the discovery, a search warrant for my laptop and flashdrive (and my wife's laptop) was not even obtained until May 15, 2015—three days before the discovery deadline.

Dated: Brooklyn, New York

November 30, 2015

*December 1, 2015*

  
\_\_\_\_\_  
Robert Bandfield

  
\_\_\_\_\_  
Witness